

1 INTRODUCTION

This Record of Decision (ROD)/Remedial Action Plan (RAP) has been prepared by ARCADIS for Sierra Army Depot (SIAD) under the Guaranteed Fixed Price Remediation (GFPR) Performance Based Contract DABJ 01-03-F-1058.

1.1 Site Names and Locations

This ROD/RAP addresses three sites at the SIAD, Lassen County, California. These three sites and the selected remedy for each site are the following:

- Old Popping Furnace (OPF) Area – Excavation and construction of an onsite Corrective Action Management Unit (CAMU).
- Upper Burning Ground (UBG) Area – Ordnance explosives/unexploded ordnance (OE/UXO) clearance and removal, excavation, and disposal in an onsite CAMU, and metal recycling or disposal.
- Equipment Yard Area (also known as the Building 79 Area) – Excavation and offsite disposal at a hazardous waste landfill.

The locations of these three sites are shown on Figure 1.1.

1.1.1 Cleanup Levels

As the future land use at these areas of SIAD is anticipated to remain as an active U.S. Department of the Army (Army) facility with potential industrial-type and military training use, the Army has selected industrial cleanup levels for the OPF, UBG, and the Equipment Yard Areas. Specific industrial cleanup goals for each of these sites are described in Sections 2.2.7.2, 3.2.7.2, and 4.2.7.2, respectively.

1.1.2 Land Use Controls

Since the Army has selected remedies for these sites with (1) industrial cleanup goals consistent with the reasonably anticipated future land use, including potential industrial-type and military training purposes; and (2) soil containing concentrations of contaminants above the industrial cleanup goals will be placed in CAMUs in the OPF and UBG Areas, the Army has chosen Land Use Controls (LUCs) as a necessary component of the selected remedies to protect human health and the environment. The LUCs will include administrative and engineering measures to be used by the Army to meet LUC objectives of restricting site use or access and limiting exposure to residual hazardous substances at the OPF, UBG, and the Equipment Yard Areas. These measures will restrict future land use and protect the long-term integrity of

the remedy at all three sites. The Army will use a range of LUCs to meet these LUC objectives and for each site will implement and manage appropriate LUCs at each site including: (1) the placement of use restrictions in the SIAD Master Plan or similar use management document, (2) notification of regulators for any planned change in land use that is inconsistent with the LUC objectives and use assumptions of the remedy, (3) SIAD Dig Permit requirements for soil disturbance, (4) appropriate coordination of LUCs with various installation management offices, (5) fencing and signage, and (6) periodic inspection and reports. Sections 2.2.8.4 and 3.2.8.3 provide more detailed description of the fencing and signage for the OPF and UBG Areas, respectively.

The LUCs will be maintained until the concentrations of hazardous substances in the soil have been reduced to levels that allow for unrestricted use and exposure. The LUC component of the remedial design will address site-specific and implementation details for each LUC, including the determination of the area boundaries where the LUC objectives will be applied and maintained at each site. The affected areas will include only currently federally-owned property.

The Army will be responsible for implementation, maintenance, periodic inspection and reporting, and enforcement of LUCs in accordance with the remedial design. Although the Army may transfer these responsibilities to another party by contract, property transfer agreement, or through other means, the Army will remain responsible for (1) conducting all Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) 121(c) reviews, (2) notification of the appropriate regulators and/or local government representatives of known LUC deficiencies or nonobservance, (3) maintaining access to the property to conduct any necessary response, (4) reservation of the authority to modify or terminate LUCs and any related deed or lease provisions, and (5) the Army will ensure that the LUC objectives are met to protect the integrity of the selected remedy.

It is understood and agreed upon by the Army and the State of California that the remedies implemented by this decision document are of a permanent nature unless the sites in question become suitable for unrestricted use and exposure. If the Army determines that there is non-compliance with a LUC, the appropriate SIAD officials will take efficient action to address the effectiveness of the LUC, including any required notifications and corrective measures. The Army will seek the concurrence of the appropriate State regulator prior to a land use change that is inconsistent with the LUC objectives, the use assumptions of the remedy, or results in the termination of LUCs.

As a condition of property transfer or lease, the Army may require the transferee or lessee, in cooperation with other stakeholders to assume responsibility for various implementation and enforcement actions. Third party LUC responsibility will be incorporated into pertinent contractual, property, and remedial documentation, such as a purchase agreement, deed, lease, and remedial design addendum. To the extent permitted by law, a transfer deed for any of these sites will require the LUCs imposed as part of a CERCLA remedy to run with the land and bind all property owners and users. The Army and regulators will consult to determine appropriate enforcement actions should there be a failure of a LUC objective at property transferred in the future.

If the Army intends to transfer ownership of any site, the Army may, if federal and/or state law allows, upon transfer of fee title grant the State an environmental covenant (Title 22, California Code of Regulations, Section 67391.1) that would allow the State to enforce LUC terms and conditions against the transferee(s), as well as subsequent property owner(s) or user(s) or their contractors, tenants, lessees or other parties. This covenant will be incorporated by reference in the transfer deed and will run with the land in accordance with applicable state law. This state enforcement right would supplement, not replace, the Army's right and responsibility to enforce LUCs as described above.

1.2 Statement of Basis and Purpose

This ROD/RAP presents the selected response actions for the three sites at SIAD. The response actions were selected by the Army in accordance with CERCLA, as amended by the Superfund Amendments Reauthorization Act of 1986 (SARA) (collectively referred to as CERCLA), the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), Division 20, Chapters 6.5 and 6.8 of the California Health and Safety Code, and the *Sierra Army Depot Federal Facilities Site Remediation Agreement* between the State of California and the Army dated 30 May 1991. This ROD/RAP includes factual and legal basis for selecting response action at each of the three sites listed in subsection 1.1. The data used to support the selected response action are contained in the Administrative Record for each site. The State of California as represented by the Department of Toxic Substances Control (DTSC) and the Lahontan Regional Water Quality Control Board (RWQCB) concur with the selected response action at each site.

Because ordnance related materials are known to exist in the OPF and UBG areas, removal actions are necessary to allow for construction activities. Investigation and removal actions are likely to uncover OE/UXO items that contain explosive materials. Some items containing explosive components may be

unsafe to move. In instances where OE/UXO items are unsafe to move, Blow-in-Place procedures will be used to destroy the item.

Under California law, Blow-in-Place procedures constitute the treatment of hazardous waste and require either a California Hazardous Waste Treatment Permit, or a Remedial Action Plan (RAP) approved by the DTSC. Actions carried out as part of a CERCLA remedial action do not require a formal permit, but must meet the substantive provisions of such a permit. This document and the associated Three Sites Remedial Design/Remedial Action (RD/RA) Plan provide documentation that all substantive requirements have been addressed for the treatment of ordnance related materials from the OPF and UBG sites. Items that are not contaminated with explosive residues will be handled as scrap metal. Items containing explosive components that are safe to move will be placed into secured storage and transported to an approved, off-site disposal facility at the conclusion of field work. Items containing explosive components that are unsafe to move will be Blown-in-Place. Blow-in-Place procedures are detailed in Section 4 and Appendix A of the Three Sites RD/RA document.

As set forth in Section 25356.1 (d) of the California Health and Safety Code, a RAP approved by DTSC must include a non-binding, preliminary allocation of financial responsibility among all identifiable potentially responsible parties. DTSC has reviewed the relevant evidence and concluded that the preliminary non-binding allocation of financial responsibility for the three sites incorporated in the ROD/RAP is as follows:

U.S. Army, Sierra Army Depot	100 percent
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1.3 Site Background Information

This subsection provides a description and history of SIAD.

1.3.1 Sierra Army Depot Site Description

SIAD is in the Honey Lake Valley of Lassen County, California, approximately 4 miles west of the California-Nevada state border and 3 miles north of U.S. Highway 395 at the Sage Flats turnoff (Figure 1.1). The two largest communities near SIAD are Susanville, California (county seat of Lassen County, 40 miles northwest of SIAD), and Reno, Nevada (55 miles southeast of SIAD). Two neighboring communities in California are Herlong, located near the southern entrance to the Main Depot, and Doyle, 8 miles south of SIAD's Main Depot.